

CAVITCH

FAMILO DURKIN & FRUTKIN
Legal Professional Association

EPA Region 5 Records Ctr.



365978

September 4, 2008

Thomas M. Cawley
Attorney at Law
tcawley@cfd.com

Fourteenth Floor
1717 East Ninth Street
Cleveland, OH 44114-2876
T 216.621.7860
F 216.621.3415
www.cfd.com

Mr. Thomas Nash
Associate Regional Counsel
U.S. Environmental Protection Agency
Region 5, C-14J
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Chemical Recovery Systems Site ("CRS Site"), Elyria, Ohio

Dear Mr. Nash:

As you know, we represent Global Film & Packaging Corporation ("Global") in connection with the CRS Site. In response to your Special Notice Letter dated August 21, 2008, please be advised of the following:

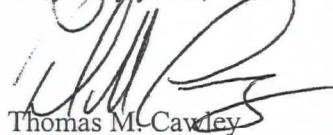
On October 19, 1988, Global entered into a Purchase Agreement with Basic Packaging Systems, Inc. ("Basic") pursuant to which Global acquired intellectual property rights and a few selected assets from Basic. A copy of the Purchase Agreement has previously been provided to you through Marsha Adams. At the time of the purchase Basic was insolvent and had ceased operations. Global never operated any business from Basic's former place of business.

It is my understanding that the potential liability associated with the CRS Site is attributable to six color, oil-based, printing presses. Global never acquired any printing presses or anything associated with the printing press business from Basic.

In light of the foregoing, it is clear that Global does not have any liability with respect to the CRS Site, and should no longer be considered a potentially responsible party.

I will contact you to discuss this matter.

Very truly yours,



Thomas M. Cawley

TMC:ild

cc: Ms. Mary Tierney

**U.S. ENVIRONMENTAL
PROTECTION AGENCY**

SEP 08 2008

**OFFICE OF REGIONAL
COUNSEL**